

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)

v.)

No. 3:12-00024

CHIEF JUDGE HAYNES

RALPH PATRICK McMAHON)

DAVID S. HAYNES
Ralph Patrick McMahon
NO GRANTED.

MOTION TO EXTEND TIME TO FILE SENTENCING MEMORANDA

Ralph Patrick McMahon respectfully moves this Honorable Court to extend the time for filing his sentencing memoranda until **April 1, 2013**. By order dated January 15, 2013, (D.E. 29), this Court ordered that sentencing memoranda be filed not later than **Monday, March 25, 2013**. The sentencing hearing is currently scheduled for **Monday, April 8, 2013, at 4:00 p.m.** Counsel would show that he requires additional time to consult with Mr. McMahon and to prepare adequate sentencing memoranda on his behalf. Mr. McMahon intends to submit memoranda requesting a sentence which is sufficient, but not greater than necessary, to comport with the factors for consideration under 18 U.S.C. § 3553(a).

Further, Mr. McMahon respectfully informs the Court that, at this time, he intends to call one witness at his sentencing hearing and expects the sentencing to last not more than one hour. (D.E. 29).

WHEREFORE for the foregoing reasons, it is respectfully requested that the Court extend the deadline for filing sentencing memoranda until **April 1, 2013**.